

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HAMILTON RESERVE BANK LTD.,

Plaintiff,

v.

THE DEMOCRATIC SOCIALIST REPUBLIC OF
SRI LANKA,

Defendant.

No. 22 Civ. 5199 (DLC)

SUPPLEMENTAL DECLARATION OF JOHN P. ALEXANDER

John P. Alexander declares and states as follows:

1. I am a counsel at the law firm of Clifford Chance US LLP, which is representing Defendant The Democratic Socialist Republic of Sri Lanka ("Sri Lanka") in the above-captioned action.

2. Attached as Exhibit 1 is a true and correct copy of a printout of an International Monetary Fund ("IMF") webpage titled, "Venezuela: Transactions with the Fund from May 01, 1984 to July 31, 2023," available at:

https://www.imf.org/external/np/fin/tad/extrans1.aspx?memberKey1=1050&endDate=2099-12-31&finposition_flag=YES.

3. Attached as Exhibit 2 is a true and correct copy of an April 8, 2003 International Development Association and International Monetary Fund note, titled: "Enhanced HIPC Initiative – Creditor Participation Issues," available at:

<https://www.imf.org/external/np/hipc/2003/creditor/040803.pdf>.

4. Attached as Exhibit 3 is a true and correct copy of IMF Press Release No. 03/160, dated September 20, 2003, titled: "IMF Approves US\$12.55 Billion Three-Year Stand-By Credit for Argentina" as obtained from the IMF's website on August 30, 2023, available at: <https://www.imf.org/en/News/Articles/2015/09/14/01/49/pr03160>

5. Attached as Exhibit 4 is a true and correct copy of an article from Reuters, dated April 30, 2007, titled: "Venezuela to Quit IMF, World Bank," available at: <https://www.reuters.com/article/us-imf-venezuela/venezuela-to-quit-imf-world-bank-idUSN3047381820070501>.

6. Attached as Exhibit 5 is a true and correct copy of the Fall 2010 Cardigan Chronicle, as published electronically by the Cardigan Mountain School, and as obtained on August 30, 2023 from <https://issuu.com/cmsscougars/docs/chronicle2010fall>.

7. Attached as Exhibit 6 is a true and correct copy of a Complaint filed by the U.S. Securities and Exchange Commission ("SEC") in *SEC v. Wey et al.*, No. 15 Civ. 7116 (S.D.N.Y.), as obtained from the public docket in that case (Doc. 1).

8. Attached as Exhibit 7 is a true and correct copy of an article from The Washington Post, dated Sept. 11, 2015, titled: "Wall Street financier Benjamin Wey charged with securities fraud, money laundering," available at: <https://www.washingtonpost.com/news/morning-mix/wp/2015/09/11/wall-street-financier-benjamin-wey-charged-with-securities-fraud-money-laundering/>.

9. Attached as Exhibit 8 is a true and correct copy of the Reply Declaration of David Siegal, dated August 12, 2016, in *United States v. Wey et al.*, No. 1:15-CR-00611 (S.D.N.Y.), as obtained from the public docket in that case (Doc. 61).

10. Attached as Exhibit 9 is a true and correct copy of an article from the New York Post, dated June 22, 2018, titled: "Intern Drops Big-Bucks Claim against Horndog CEO," available at:

<https://nypost.com/2018/06/22/intern-drops-big-bucks-claim-against-horndog-ceo/>.

11. Attached as Exhibit 10 is a true and correct copy of a July 28, 2023 announcement by the Central Bank of Sri Lanka ("CBSL"), as obtained from the CBSL website, available at: <https://www.treasury.gov.lk/api/file/1eef11dc-33c5-4e61-b450-e90e3c9f8308>.

12. Attached as Exhibit 11 is a true and correct copy of a Monetary Policy Report dated July 31, 2023, as obtained from the CBSL website, available at: <https://www.cbsl.gov.lk/en/publications/economic-and-financial-reports/monetary-policy-reports/monetary-policy-report-2023-july>.

13. Attached as Exhibit 12 is a true and correct copy of an August 25, 2023 announcement by the CBSL, as obtained from the CBSL website, available at: <https://www.treasury.gov.lk/api/file/b1bb5b78-605d-46f0-a5da-6f89069f9c72>.

14. Attached as Exhibit 13 is a true and correct copy of a Certificate of Amendment of the Certificate of Organization of State Trust International Bank & Trust LLC, dated March 29, 2022, and accompanying papers, as obtained from the Puerto Rico Department of State website on August 25, 2023.

15. Attached as Exhibit 14 is a true and correct copy of an article from *El Nuevo Día*, dated November 16, 2022, titled: "En problemas otra entidad bancaria internacional," as obtained from LexisNexis on August 28, 2023, along with a machine translation of the original

Spanish-language article as obtained from Google Translate.

16. Attached as Exhibit 15 is a true and correct copy of a Unanimous Consent of the Board of Directors in Lieu of Meeting of Hamilton International Reserve Bank, LLC, dated May 26, 2023, as obtained from the Puerto Rico Department of State website on August 25, 2023.

17. Attached as Exhibit 16 is a true and correct copy of an article from Reuters, dated August 15, 2023, titled: "IMF Staff to Visit Sri Lanka in Sept for first programme review," as obtained from Westlaw.

18. Attached as Exhibit 17 is a true and correct copy of a printout from the Labuan Financial Services Authority ("FSA") website, titled: "Business Restriction on Labuan Licensed Entities," as obtained on August 30, 2023, available at: <https://www.labuanfsa.gov.my/general-info/investor-alerts/business-restriction-on-labuan-licensed-entities>.

19. Attached as Exhibit 18 is a true and correct copy of a printout of a Labuan FSA website listing for "Fintech Bank Ltd.," as obtained on August 30, 2023, available at: <https://www.labuanfsa.gov.my/areas-of-business/financial-services/banking/list-of-labuan-banks-and-investment-banks/details?id=08fd3c32-1c2a-4cc8-91e9-93e6c93499e6>.

20. Attached as Exhibit 19 is a true and correct copy of a printout of a Paris Club webpage, titled "The Six Principles" as obtained from the Paris Club website on August 30, 2023, available at: <https://clubdeparis.org/en/communications/page/the-six-principles>.

21. Attached as Exhibit 20 is a true and correct copy of a letter and proposed *amicus curiae* brief we have received from the Paris Club secretariat, which we understand is also in the process of being submitted to the Court separately on behalf of France and the United

Kingdom.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2023
New York, New York

s/ John P. Alexander
John P. Alexander